

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Chapter 13

MARGARET A. PIATKOWSKI,

Debtor.

Case No.: 19-16887-MDC

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY
FILED BY BANK OF AMERICA**

Debtor, Margaret Piatkowski (hereafter :Debtor"), through and by counsel, responds to the Bank of America's Motion of for Relief from the Automatic Stay, as follows:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted
6. Admitted.
7. Denied. Movant has not provided any evidence regarding the allegations in Paragraph 7. Debtor demands strict proof of the outstanding mortgage balance.
8. Denied. Movant has not provided any evidence regarding the allegations in Paragraph 8. Debtor demands strict proof of fees and costs incurred by Movant.
9. Denied. Debtor has sufficient funds to cure any present delinquency.
10. Denied.

11. Admitted.
12. Admitted.
13. Admitted.
14. Denied.

WHEREFORE, Debtor respectfully requests an Order denying Bank of America's Motion for Relief from the Automatic Stay.

Date: August 25, 2021

BY: /s/ Vlad Kachka
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